# #1

### COMPLETE

Collector: Web Link 1 (Web Link)

Started: Tuesday, January 30, 2018 12:36:13 PM Last Modified: Tuesday, January 30, 2018 12:45:43 PM

**Time Spent:** 00:09:29 **IP Address:** 47.32.143.88

Page 1

Q1 First Name (Optional)

Cynthia

Q2 Last Name (Optional)

Gonzalez

Q3 Organization (Optional)

Elite Care California

Q4 Title (Optional)

CEO

**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Enforcement Subcommittee** 

### **Q6** Feedback for Subcommittee

License 9 Temporary holders should not be listed in the BCC online search, which presently includes our NON-STORE FRONT business address. We deserve the same protection as the listing perimeters for Growers on the BCC licensing site, which DOES NOT PRESENT THEIR ACTUAL ADDRESS FOR THEIR GROW PREMISE.

This is a serious concern for all of our safety.

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### COMPLETE

Collector: Web Link 1 (Web Link)

Started: Tuesday, January 30, 2018 1:55:33 PM Last Modified: Tuesday, January 30, 2018 1:57:14 PM

**Time Spent:** 00:01:41 **IP Address:** 99.127.117.100

Page 1

**Q1** First Name (Optional)

Scott

**Q2** Last Name (Optional)

Brown

Q3 Organization (Optional)

USA.

Q4 Title (Optional)

Top dog

**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Enforcement Subcommittee** 

**Q6** Feedback for Subcommittee

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# #3

### COMPLETE

Collector: Web Link 1 (Web Link)

Started: Tuesday, January 30, 2018 11:15:07 PM Last Modified: Tuesday, January 30, 2018 11:19:31 PM

**Time Spent:** 00:04:24 **IP Address:** 66.87.134.154

Page 1

**Q1** First Name (Optional)

The

Q2 Last Name (Optional)

Community

Q3 Organization (Optional)

Orbit

Q4 Title (Optional)

Patient/Activist

**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Enforcement Subcommittee** 

### **Q6** Feedback for Subcommittee

What If a educational patient based event. Free entry with valid rec and id has been going for over 2 years. What will happen next.

#4

### COMPLETE

Collector: Web Link 1 (Web Link)

**Started:** Wednesday, January 31, 2018 12:53:01 PM **Last Modified:** Wednesday, January 31, 2018 12:56:50 PM

**Time Spent:** 00:03:48 **IP Address:** 75.150.232.109

Page 1

Q1 First Name (Optional)

Jordan

Q2 Last Name (Optional)

Zoot, CPA

Q3 Organization (Optional)

aBIZinaBOX Inc. Cannabis Practice Group

Q4 Title (Optional)

M

**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Enforcement Subcommittee** 

#### Q6 Feedback for Subcommittee

Enforcement and Licensing is will succeed only with the assistance of professionals attorneys, CPA's, Enrolled Agents and others skilled in regulatory compliance filing process.

California Combined Cannabis Business Representation Credential – CCCBRC came to me in a dream last night. Either that, or it was a nightmare. No, it was a dream; the nightmare is the situation that those of us that represent commercial cannabis businesses in California are currently living with. The nightmare is having to deal with somewhere between a half dozen to a dozen different state agencies each of which has different rules and procedures for the representation of individuals and businesses that are involved with the cannabis industry. Don't forget our thoughts on how NOT to become an expert.

#### Relevant Definitions - Circular 230 Practitioners

We need to introduce some terminology and background to understand both the problem and a very elegant potential solution. The first aspect is the concept of a relational database, a relational database management system ["DBMS"] and the key element in a database, which is a common unique identifier or "CUI". The relevant definitions are:

Relational Database – A relational database, more restrictively, is a collection of schemas, tables, queries, reports, views, and other elements. Database designers typically organize the data to model aspects of reality in a way that supports processes requiring information, such as (for example) modeling the availability of rooms in hotels in a way that supports finding a hotel with vacancies. Database Management System ["DBMS"] – is a computer-software application that interacts with end-users, other applications, and the database itself to capture and analyze data. A general-purpose DBMS allows the definition, creation, querying, update, and administration of databases.

Common Unique Identifier ["CUI"] – is a unique identifying record that has been vetted, verified, and is maintained in a secure repository such that it is accepted as a reliable means to identify an individual or item. The most common examples are social security numbers ["SSN"], driver's license numbers ["DLN"], and vehicle identification numbers ["VIN"].

There are substantial concerns about the privacy of personal financial information such that SSN and DLN information is not the preferred choice for the purpose that I have in mind. However, the license number for an attorney or certified public accountant ["CPA"] issued by a State, or the registration number issued by the US Treasury – Internal Revenue Service ["IRS"] to an Enrolled Agent ["EA"] are other examples of such numbers.

Each represents publicly available information for a group of individuals that has already been granted the right to represent both individual and business taxpayers in every jurisdiction in the United States [collectively, they are referred to by the IRS as "Circular 230 Practitioners"]. The individuals in this group have had their personal identification verified, usually including US passport, driver's license or state identification, fingerprints, and in some jurisdictions DNA independently verified by the issuer of their credentials. The academic credentials, and satisfaction of required examinations and experience have also been verified [we note that the deficiency for EA's is a lack of education and experience requirement, which we have previously discussed and you can read about here.]

#### Additional CUI's Which We Rejected

We are aware of additional CUI's such as:

Preparer Tax Identification Number ["PTIN"] is an identification number that all paid tax return preparers must use on U.S. federal tax returns or claims for refund submitted to the Internal Revenue Service (IRS).

California Tax Education Council ["CTEC"] – is a registration which is unique to California [New York and Oregon are examples of additional states which have similar programs]. California law requires anyone who prepares (or assists with) tax returns for a fee, and is not an attorney, certified public accountant (CPA) or enrolled agent (EA), to register as a tax preparer with CTEC.

Both of these CUI's represent individuals with substantially lower levels of experience, education, validation and verification than Circular 230 Practitioners. As such, while they may have some skills and provide a useful service, they are not appropriate at this point in our analysis.

### Circular 230 Databases Currently In Use

Just to provide additional background on relational databases currently in use to verify or validate Circular 230 Practitioners in California that are currently in use, we have:

Attorney Look Up on the California Bar website.

CPA License Look Up on the website of the California Board of Accountancy which is part of the Department of Consumer Affairs Enrolled Agent Look Up where the IRS provides a procedure to validate EA's by email.

There are similar search and lookups provided in all of the US states and territories, and the ability to verify firms and professional service entities are available. You can read more about them here. As an outstanding example of how multiple lookups can be combined, we highlight CPAVerify.com, a project of the National Association of State Boards of Accountancy ["NASBA"].

CPAverify is an online central repository of information about licensed CPAs and public accounting firms maintained by the National Association of State Boards of Accountancy (NASBA) to provide a single-search resource covering participating jurisdictions where a person or firm has been licensed. With the widespread adoption of mobility, the need for the general public to be able to determine if a person or firm is licensed and in good standing is more prevalent than ever.

Just to provide an illustration, here is what is returned when I look myself up on CPAVerify.

California Combined Cannabis - California Cannabis CPA Jordan S. Zoot CPA – CPAVerify.com Search Results Inter-Agency Databases In Use Today

There are several states that already provide comprehensive portals where tax professionals can register themselves, as well as individual and business entity clients that they represent, to obtain confidential taxpayer information as well as file tax returns and make payments on behalf of their clients. As an example we highlight several that we consider being the most advanced, secure and well executed:

New York State Dept. of Taxation and Finance Online Portal for Tax Professionals – tax professional registration of a business entity, registration of an individual taxpayer, and list of types of transactions that can be performed online.

California Franchise Tax Board ["FTB"] – the FTB website permits a Tax Professional to access and initiate the following: Account information:

View account balance and tax year details.

View estimated payments and credits before filing a return.

Verify the exact business entity name to use when filing a return.

View payment history.

View a list of tax returns.

View images of tax returns.\*

View a list and images of notices and correspondence.

Update contact information.\*

View proposed assessments.

View California wage and withholding information – individual clients only.

View FTB-issued 1099 information – individual clients only.

Online services:

Calculate a balance due for a date in the future.

File a power of attorney (POA).

File a nonresident withholding waiver request.

Protest a proposed assessment.\*

Respond to a proposed assessment to request a 30-day deferral to file a tax return.\*

Options to communicate with us:

Chat with an FTB representative about confidential matters.

Send a secure message with attachments to FTB.

Further, FTB makes the following services available to Tax Practitioners that can be reviewed here.

California Dept. of Tax and Fee Administration ["CDTFA"] – Form CDTFA-392 is already in use and common to CDTFA and the California Employment Development Department ["EDD"] though at this time, the current requirements require a separate form even if identical information is provided be provided to each agency. Further, CDTFA already has an electronic services portal that Circular 230 Professionals can access for multiple individuals and business entities after completing a Power of Attorney registration process for each. A snapshot of the main Online Services screen appears below.

California Cannabis CPA

California Combined Cannabis - CDTFA

California Cannabis Regulatory Agencies - Combined Access

The triad of California agencies with direct regulatory oversight of the commercial cannabis industry –

California Bureau of Cannabis Control ["BCC"] - Distribution and Retail Licenses

California Dept. of Public Health ["CDPH"] – Manufactured Cannabis Safety Board ["MCSB"] – Manufacturing and Testing Licenses California Dept. of Food and Agriculture ["CFDA"]

have already integrated their Online Licensing and Registration Portals and share all kinds of information for all kinds of licenses. The information is on the BCC website:

California Combined Cannabis

California Cannabis CPA

when a prospective applicant takes the next step and selects the Online Licensing Portal for ANY license they are taken to:

California Combined Cannabis

**BCC Online Licensing Portal** 

Once the log-in and authentication process is complete, BCC presents the applicant with the choice that involves all three distinct agencies:

California Combined Cannabis

BCC, CDPH, and CDFA share common licensing site.

All of which illustrates that the inter-related relational database concept linking multiple agencies is not only possible, but the California cannabis regulators have already implemented the baseline version.

What Additional Features Should CCCBRC Include for Implementation?

If you have stayed with this and gotten this far, permit us to present "CCCBRC Nirvana".

Our Wishlist

Let's start with the BCC Online Licensing Portal and Add:

Basic Necessities - List 1

Franchise Tax Board

**CDTFA** for Taxes

**EDD** for Employees

California Secretary of State Cannabizfile Program – we note that CASOS fully understands the overall concept, and has cannabis legend Cheech Marin engaged and is stumping for their program.

State Bar and Board of Accountancy for Circular 230 Professional Online Validation of Attorneys and CPA's [sorry Enrolled Agents you are gonna have to send in paper forms until IRS modernizes the EA verification process]

METRC Track and Trace – so online training is added to the platform.

Second Tier State Regulatory Agencies - List 2

The second tier list adds California State Agencies that are involved with some subpart of cannabis regulation such as water and pesticides.

California Water Board

California Dept. of Fish and Wildlife ["CADFW"]

California Dept. of Pesticide Regulation

California Highway Patrol

California Dept. of Environmental Protection

California Attorney General – Campaign Against Marijuana Planting ["CAMP"]

Third Tier County and Municipal Agencies - List 3

Having taken you this far, now we swing for the fences and use Humboldt County, CA to illustrate the importance of county and municipal governments in the California cannabis regulation scheme, starting with zoning and land use which is an absolute requirement that an approval be obtained for many of the California state level licenses.

Humboldt County Track and Trace – yes, the county has its own program which will continue to operate even with METRC coming online.

Cannabis Services Division for County Permitting, Land Use, and Environmental

## #5

### COMPLETE

Collector: Web Link 1 (Web Link)

**Started:** Wednesday, January 31, 2018 6:15:52 PM **Last Modified:** Wednesday, January 31, 2018 6:30:24 PM

**Time Spent:** 00:14:31 **IP Address:** 159.83.168.250

### Page 1

Q1 First Name (Optional)	Respondent skipped this question
Q2 Last Name (Optional)	Respondent skipped this question
Q3 Organization (Optional)	Respondent skipped this question
Q4 Title (Optional)	Respondent skipped this question
Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may	Enforcement Subcommittee

### **Q6** Feedback for Subcommittee

submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional

- -The Bureau of Cannabis needs to regulate all cannabis businesses and needs to have an enforcement section to enforce the state laws on cannabis.
- -If the Bureau will not have an enforcement section, it needs to provide the necessary funding for law enforcement agencies and other local agencies to ensure local and state regulations are enforced-the State has not provided funding. Why?
- -Regulation of local cannabis businesses is a law enforcement issue. Because there are inherent risks around cannabis businesses (cash, guns, criminal element) regulations should not be enforced by planning or building code departments, rather by police agencies.

(

comments.

#6

## COMPLETE

Collector: Web Link 1 (Web Link)

Started: Thursday, February 01, 2018 9:05:10 AM Last Modified: Thursday, February 01, 2018 9:13:43 AM

**Time Spent:** 00:08:33 **IP Address:** 172.116.233.36

Page 1

Q1 First Name (Optional)

Mark

Q2 Last Name (Optional)

Douglas

Q3 Organization (Optional)

Green America Inc

Q4 Title (Optional)

Managing Member

**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Enforcement Subcommittee** 

### **Q6** Feedback for Subcommittee

Closing of illegal shops. Stronger enforcement on the closing of illegal pot shops has to better in the Riverside County area there's alot and opening daily. In the City of Perris they are even getting licenses for medical and still operating illegally as recreational. This is really hurting the shops operating correctly and in compliance.

## #7

### COMPLETE

Collector: Web Link 1 (Web Link)

Started: Thursday, February 01, 2018 1:17:58 PM Last Modified: Thursday, February 01, 2018 1:36:21 PM

**Time Spent:** 00:18:22 **IP Address:** 76.126.210.173

Page 1

Q1 First Name (Optional)

Kristin

Q2 Last Name (Optional)

Respondent skipped this question

Q3 Organization (Optional)

N/A

Q4 Title (Optional)

Respondent skipped this question

**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Enforcement Subcommittee** 

### Q6 Feedback for Subcommittee

Coming from a chronically ill individual, I myself rely on medical marijuana to treat severe and chronic pain. After years of taking different drugs and pain killers, prescribed by my doctors, to treat my chronic pain, I decide to try the natural route. I was never a pot smoker before, in fact, I use to be highly asgainst it, until a friend suggested I try it for my pain. It changed my life. It completely helped my pain subside, and helped me with my appetite and digestion. I feel more alive instead of being doped up on pills! I treat it like any other medication. I use it when needed.

Since the legalization of marijuana (for recreational use), it has made it difficult for me to get my medication. The new rules and laws are confusing, ever changing, and some are even scary. It's a whole new stress. Something the chronically and terminally ill do not need. We're not all criminals, druggies, or losers (I myself am a college graduate like many others). Please make it easier and less confusing for the ill to get their medicine.

It's time for change. It's time for education. It's time for understanding.

#8

## COMPLETE

Collector: Web Link 1 (Web Link)

Started: Thursday, February 01, 2018 2:02:43 PM Last Modified: Thursday, February 01, 2018 2:05:39 PM

**Time Spent:** 00:02:56 **IP Address:** 98.234.230.36

Page 1

Q1 First Name (Optional)

Jonathan

Q2 Last Name (Optional)

Kramer

Q3 Organization (Optional)

NVizhon Group LLC

Q4 Title (Optional)

President

**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Enforcement Subcommittee** 

### **Q6** Feedback for Subcommittee

It's clear that since there are no licenses for those who have been running online business, something must be done to enforce the new laws in order that those who've invested in establishing retail business are protected. Similar to the black market these people are selling products from all over the country many of which are snake oil. That plus delivering them to customers that potentially might go to a dispensary isn't in keeping with the new laws.

# #9

### COMPLETE

Collector: Web Link 1 (Web Link)

Started: Monday, February 05, 2018 10:33:06 AM Last Modified: Monday, February 05, 2018 10:45:42 AM

 Time Spent:
 00:12:35

 IP Address:
 50.250.197.190

Page 1

**Q1** First Name (Optional)

Nancy

**Q2** Last Name (Optional)

Belli

Q3 Organization (Optional)

Cannabis Consulting

Q4 Title (Optional)

Owner

**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Enforcement Subcommittee** 

### **Q6** Feedback for Subcommittee

One of the biggest issues that still needs to be further refined in the State regulations is cannabis waste. Cannabis waste is a problematic waste stream and needs to be properly addressed at all levels as this waste is highly desirable and can be harmful if someone obtains it in the wrong hands. As a result, enforcement of proper cannabis waste management is crucial so there are no social and health impacts. The reality is that operators will not manage the cannabis waste themselves by rendering it neutralized (unrecognizable and unusable) per the State regulations. This is because many operators do not have the space or means to render the cannabis waste, and throwing it in the trash receptacles is non-compliant per State Regulations.

The State Regulations should be updated to require all cannabis operators either hire a third party cannabis license waste management company to handle cannabis waste, or require the operator to hire a third party consultant to verify their waste is being properly rendered to show to the State. These requirements will make State Enforcement more efficient as the State Enforcement Agency can simply request proof of a third party cannabis waste management company, or third party verification that waste was properly handled. This will avoid any loopholes in which the cannabis product goes undetected and if no documentation can be provided, then the State Enforcement Agency knows the operator is not compliantly handling their waste.

# #10

### COMPLETE

Collector: Web Link 1 (Web Link)

Started: Monday, February 05, 2018 1:36:57 PM Last Modified: Monday, February 05, 2018 2:09:41 PM

**Time Spent:** 00:32:43 **IP Address:** 66.215.116.116

Page 1

**Q1** First Name (Optional)

Brad

Q2 Last Name (Optional)

Schultz

Q3 Organization (Optional)

Coastal Dance and Music Academy

Q4 Title (Optional)

Emergency Cannabis Regulation - 5026 600 FT Radius Youth Centers

**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Enforcement Subcommittee** 

### Q6 Feedback for Subcommittee

- 1. The City of Grover Beach, CA issued a land use permit on 1/22/18 to Natural Healing Center, LLC that is in violation of the Emergency Cannabis Regulation, section § 5026 (a) Premises Location, which states, "(a) A premises licensed under this division shall not be located within a 600-foot radius of a school providing instruction in kindergarten or any grades 1 through 12, day care center, or youth center that is in existence at the time the license is issued.
- 2. We are classified as a youth center under the following definition provided by the HEALTH AND SAFETY CODE HSC DIVISION
- 10. "Youth center" means any public or private facility that is primarily used to host recreational or social activities for minors, including, but not limited to, private youth membership organizations or clubs, social service teenage club facilities, video arcades, or similar amusement park facilities.
- 3. Natural Healing Center's cannabis industry (growth, manufacture, and distribuion) will be within 150 feet of our youth center that holds dance classes and theater classes as well as rehearsals for our non-profit youth performances for preschool through age 18. We will be sharing the same parking lot!
- 4. The Cityof Grover Beach's ordinance related to this matter is silent on a set back or radius for youth centers and childcare facilities. It only stipulates a 600-foot radius from K 12 schools, therefore the California State Emergency Regulation 5026 (a) is in effect and protects the children that participate in our dance and theater classes.
- 4. Natural Healing Center's next step is to apply for a state license which we will appose and hope that it will be denied based on the arguments listed above.
- 5. We feel the Emergency Cannabis Regulation 5026 is rendered meaningless when local governments can alter the regulation. The spirit and intent is to protect the health and safety of our youth before, during after school the school day!

# #11

## COMPLETE

Collector: Web Link 1 (Web Link)

Started: Monday, February 05, 2018 2:20:01 PM Last Modified: Monday, February 05, 2018 2:24:38 PM

**Time Spent:** 00:04:37

**IP Address:** 146.233.255.211

## Page 1

Q1 First Name (Optional) Respondent skipped this question

Q2 Last Name (Optional)

Respondent skipped this question

Q3 Organization (Optional)

Respondent skipped this question

Q4 Title (Optional)

Respondent skipped this question

**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Enforcement Subcommittee** 

### **Q6** Feedback for Subcommittee

Weight Enhancements - over a specific amount would be a felony (possibly consider 10 pound or 100 plant limit). The only way to enforce the black market is through fines and felonies

# #12

### COMPLETE

Collector: Web Link 1 (Web Link)

Started: Monday, February 05, 2018 2:35:06 PM Last Modified: Monday, February 05, 2018 2:36:43 PM

**Time Spent:** 00:01:36 **IP Address:** 68.98.226.197

Page 1

**Q1** First Name (Optional)

Bill

Q2 Last Name (Optional)

Krahel

Q3 Organization (Optional)

OnSite Waste Solutions

Q4 Title (Optional)

President & CEO

**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Enforcement Subcommittee** 

**Q6** Feedback for Subcommittee

Same question as posed to the Cultivators SubCommitte

# #13

### COMPLETE

Collector: Web Link 1 (Web Link)

Started: Monday, February 05, 2018 7:31:11 AM Last Modified: Monday, February 05, 2018 3:11:33 PM

**Time Spent:** 07:40:21 **IP Address:** 159.83.252.213

## Page 1

Q1 First Name (Optional)	Respondent skipped this question
Q2 Last Name (Optional)	Respondent skipped this question
Q3 Organization (Optional)	Respondent skipped this question
Q4 Title (Optional)	Respondent skipped this question

**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Enforcement Subcommittee** 

### **Q6** Feedback for Subcommittee

Request to provide authority to the Local Health Officer to require permits, do inspections, or perform other activities in the city.

# #14

## COMPLETE

Collector: Web Link 1 (Web Link)

Started: Monday, February 05, 2018 4:31:12 PM Last Modified: Monday, February 05, 2018 4:35:06 PM

**Time Spent:** 00:03:53 **IP Address:** 66.180.254.218

### Page 1

Q1 First Name (Optional)	Respondent skipped this question
Q2 Last Name (Optional)	Respondent skipped this question
Q3 Organization (Optional)	Respondent skipped this question
Q4 Title (Optional)	Respondent skipped this question
Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.	Enforcement Subcommittee

### **Q6** Feedback for Subcommittee

Hello, I would like to propose that the BCC pass some type of public consumption permit. I believe that this is a problem that will quickly need to be addressed as there will be many tourists flocking to CA to buy recreational cannabis with nowhere to smoke/ingest/vape it. Tourists will not have private residences, they will not be able to smoke in their cars or in public, leaving them with no option but to consume in public. I strongly urge the Bureau to address this problem as quickly as possible. Thank you.

## #15

### COMPLETE

Collector: Web Link 1 (Web Link)

Started: Monday, February 05, 2018 8:03:58 PM Last Modified: Monday, February 05, 2018 8:12:50 PM

**Time Spent:** 00:08:51 **IP Address:** 47.32.143.88

Page 1

Q1 First Name (Optional)

**CYNTHIA** 

Q2 Last Name (Optional)

GONZALEZ

Q3 Organization (Optional)

ELITE CARE CALIFORNIA

Q4 Title (Optional)

CEO/FOUNDER

**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Enforcement Subcommittee** 

#### Q6 Feedback for Subcommittee

Please reconsider placing the addressees of the NON STOREFRONT DELIVERY LICENSE PREMISE FOR ALL TO KNOW, SEE, ACCESS.

We suggest that you detail the owners mailing address, business name, phone numbers, email address...but to NOT REQUIRE US TO REVEAL OUR PREMISE LOCATION/ADDRESS.

- 2 REASONS:
- 1. IN THE SAME ONLINE NOTICE, GROWERS DO NOT HAVE TO REPORT THEIR PREMISE. AND IT SEEMS THAT THE SAME PROTECTIVE MEASURES SHOULD BE MADE FOR NON STORE FRONT PREMISES, AS WELL.
- 2. WE ARE INVITING ADDITIONAL CONCERNS AS A DELIVERY PREMISE, IS NOT STAFFED AS A STORE FRONT, THEREFORE UNWANTED "VISITS" ARE LESS LIKELY TO OCCUR IF OUR PREMISE ADDRESS COULD REMAIN ANONYMOUS.

2.

## #16

### COMPLETE

Collector: Web Link 1 (Web Link)

Started: Monday, February 05, 2018 9:48:50 PM Last Modified: Monday, February 05, 2018 9:54:20 PM

**Time Spent:** 00:05:30 **IP Address:** 184.184.240.2

Page 1

Q1 First Name (Optional)

Stephanie

Q2 Last Name (Optional)

Hopper

Q3 Organization (Optional)

Canndescent

Q4 Title (Optional)

Government Affairs

**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Enforcement Subcommittee** 

#### Q6 Feedback for Subcommittee

- 1. Advertising rules need to allow cannabis companies to participate in main stream marketing similar to tobacco, alcohol, and pharmaceuticals.
- 2. Allow cannabis businesses to do PSAs and other drug education marketing/advertisments.
- 3. Allow surveillance system to record when motion is detected versus continuous, 24 hours per day. Surveillance systems are advanced enough that they have the ability to record when there is motion, saving on energy and storage while capturing the activity in an area. If there is an intentional issue with the surveillance system, the camera system will not record regardless of motion or continuous recording.
- 4. Need to have an enforcement plan to address those who are not able to or trying to obtain an annual license. The cost of doing business in the regulated market is expensive compared to the other cannabis companies. Enforcement will either allow the regulated industry to thrive or destroy it due to costs of licensing.

## #17

### COMPLETE

Collector: Web Link 1 (Web Link)

Started: Tuesday, February 06, 2018 12:27:45 AM Last Modified: Tuesday, February 06, 2018 12:33:10 AM

**Time Spent:** 00:05:24 **IP Address:** 47.32.143.88

### Page 1

Q1 First Name (Optional)	Respondent	skipped this	question
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Q2 Last Name (Optional)

Respondent skipped this question

Q3 Organization (Optional)

Respondent skipped this question

Q4 Title (Optional)

Respondent skipped this question

**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Enforcement Subcommittee** 

### **Q6** Feedback for Subcommittee

The businesses that are NOT already permitted or have an application submitted need to be fined and shut down ASAP.

It makes no sense to regulate if you are NOT going to enforce the regulations to ALL.

## #18

## COMPLETE

Collector: Web Link 1 (Web Link)

Started: Tuesday, February 06, 2018 11:01:42 AM Last Modified: Tuesday, February 06, 2018 11:05:49 AM

**Time Spent:** 00:04:07 **IP Address:** 157.131.133.78

Page 1

Q1 First Name (Optional)

Joanna

**Q2** Last Name (Optional)

Cedar

Q3 Organization (Optional)

Respondent skipped this question

Q4 Title (Optional)

Respondent skipped this question

**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Enforcement Subcommittee** 

### Q6 Feedback for Subcommittee

The BCC should focus its efforts on enforcing the law with unlicensed retail outlets before they start doing compliance checks on licensed entities. Licensed entities are paying taxes and having their business and market share curtailed by the those operating outside of the regulatory schema.

# #19

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Collector: Web Link 1 (Web Link)

Started: Tuesday, February 06, 2018 11:04:42 AM Last Modified: Tuesday, February 06, 2018 11:06:38 AM

**Time Spent:** 00:01:56 **IP Address:** 73.93.155.89

Page 1

**Q1** First Name (Optional)

Jeff

Q2 Last Name (Optional)

**Brothers** 

Q3 Organization (Optional)

VetGrow Inc

Q4 Title (Optional)

CEO

**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Enforcement Subcommittee** 

**Q6** Feedback for Subcommittee

Cannabis that is donated to those most in need should not be taxed.

## #20

### COMPLETE

Collector: Web Link 1 (Web Link)

Started: Tuesday, February 06, 2018 11:06:54 AM Last Modified: Tuesday, February 06, 2018 11:06:56 AM

**Time Spent:** 00:00:02 **IP Address:** 73.93.155.89

Page 1

**Q1** First Name (Optional)

Jeff

Q2 Last Name (Optional)

**Brothers** 

Q3 Organization (Optional)

VetGrow Inc

Q4 Title (Optional)

CEO

**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Enforcement Subcommittee** 

**Q6** Feedback for Subcommittee

Cannabis that is donated to those most in need should not be taxed.

# #21

## COMPLETE

Collector: Web Link 1 (Web Link)

Started: Tuesday, February 06, 2018 11:15:36 AM Last Modified: Tuesday, February 06, 2018 11:21:00 AM

**Time Spent:** 00:05:23 **IP Address:** 50.250.197.190

Page 1

**Q1** First Name (Optional)

Brian

**Q2** Last Name (Optional)

Kahn

Q3 Organization (Optional)

Cannabis Operator

Q4 Title (Optional)

Respondent skipped this question

**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Enforcement Subcommittee** 

### Q6 Feedback for Subcommittee

The regulations need to be updated to properly address who is able to properly manage all the cananbis waste that will be created. More specifically, the regulations need to ensure that if a cannabis operator is going to utilize a third party cannabis waste management company, the cannabis waste management company must obtain the proper cannabis licenses to transport and render the cannabis waste. Any random person or existing trash company CANNOT handle cannabis waste. This cannabis waste management company MUST have the appropriate cannabis licenses such as a cannabis distribution license and cannabis manufacturing license (processing license). Since the product that will be picked up is untreated cannabis product (un-rendered cannabis product), the movement of the cannabis requires a distribution license. The distribution license will allow the canabis waste management company to pick up the untreated cannabis since it is still considered cannabis product, and the manufacturing (processing) license will allow the waste management company to render the cannabis product into neutrialized cannabis waste. These licenses not only make the cannabis waste management company compliant, but also help with the track and tracing of all stages of the cannabis product through Metrc since all cannabis license holders need to use the track and trace system. The proposed changes will guarantee that all cannabis waste is being handled by cannabis-permitted companies that have extensive working knowledge in the industry. These changes will ensure that all cannabis waste streams are properly identified and documented through the State's Track and Trace System, and ensure all cannabis operators are working compliantly together.

## #22

## COMPLETE

Collector: Web Link 1 (Web Link)

Started: Tuesday, February 06, 2018 11:40:12 AM Last Modified: Tuesday, February 06, 2018 11:43:00 AM

**Time Spent:** 00:02:48 **IP Address:** 73.241.160.4

Page 1

Q1 First Name (Optional)

Sharon

Q2 Last Name (Optional)

Bertrand

Q3 Organization (Optional)

Respondent skipped this question

Q4 Title (Optional)

Respondent skipped this question

**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Enforcement Subcommittee** 

### Q6 Feedback for Subcommittee

Stop taxing compassionate cannabis. You have priced patients out of the market. This was not the intent of folks voting for this law. Make compassionate use free to the manufacturer and the patient please.

## #23

### COMPLETE

Collector: Web Link 1 (Web Link)

Started: Tuesday, February 06, 2018 11:57:41 AM Last Modified: Tuesday, February 06, 2018 12:05:46 PM

**Time Spent:** 00:08:05 **IP Address:** 24.7.7.214

### Page 1

comments.

Q1 First Name (Optional)	Respondent skipped this question
Q2 Last Name (Optional)	Respondent skipped this question
Q3 Organization (Optional)	Respondent skipped this question
Q4 Title (Optional)	Respondent skipped this question
Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional	Enforcement Subcommittee

### **Q6** Feedback for Subcommittee

Starting with Dennis Peron there has been a long history of compassionate cannabis use in California. Recognizing so many movements that society comes to consider 'basic' social rights begin with heroic individuals doing the 'right' thing in light of overly restrictive laws, and understanding we highly value these people today (ie: George Washington, Martin Luther King, Jr. etc.) I urge you to reconsider the regulations around the Compassionate Sharing of Cannabis by organizations whom are not seeking profits but are helping people who cannot afford legal medicine (not covered under Medicare or medical programs).

This activity has been providing service for decades within our State, and as we have removed the criminal components of the past, let us also not lose the compassion that has been beneficial to so many of our citizens.

## #24

## COMPLETE

Collector: Web Link 1 (Web Link)

Started: Tuesday, February 06, 2018 1:23:08 PM Last Modified: Tuesday, February 06, 2018 1:26:51 PM

**Time Spent:** 00:03:43 **IP Address:** 24.5.112.22

Page 1

Q1 First Name (Optional)

richard

Q2 Last Name (Optional)

de andrade

Q3 Organization (Optional)

solare capital LLC

Q4 Title (Optional)

CEO - Member

**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Enforcement Subcommittee** 

### **Q6** Feedback for Subcommittee

What safeguards are there in the traceability system that ensure that contaminated produces can not only be traced to the facility where they were handled vs the facility, person, and time of person contact with the product in the supply chain?

METRC does not allow this functionality

## #25

## COMPLETE

Collector: Web Link 1 (Web Link)

Started: Tuesday, February 06, 2018 1:32:05 PM Last Modified: Tuesday, February 06, 2018 1:39:06 PM

**Time Spent:** 00:07:01 **IP Address:** 50.81.159.114

Page 1

Q1 First Name (Optional)

sandra

**Q2** Last Name (Optional)

Respondent skipped this question

Q3 Organization (Optional)

patient

Q4 Title (Optional)

disabled

**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Enforcement Subcommittee** 

### Q6 Feedback for Subcommittee

I am a Colon surgery survivor .. I think towns should not charge fees for patients to privatly grow their six plants outside. Many patients can not afford the fees an will loss access to their personal gardens. Also forcing patients to grow inside is unjust .. We can not afford the electric bill for grow equipment and again loss access to grow personal medicine.

## #26

### COMPLETE

Collector: Web Link 1 (Web Link)

Started: Tuesday, February 06, 2018 2:22:39 PM Last Modified: Tuesday, February 06, 2018 2:23:48 PM

**Time Spent:** 00:01:09 **IP Address:** 73.93.155.175

Page 1

**Q1** First Name (Optional)

Megumi

Q2 Last Name (Optional)

Reagan

Q3 Organization (Optional)

Respondent skipped this question

Q4 Title (Optional)

Respondent skipped this question

**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Enforcement Subcommittee** 

### Q6 Feedback for Subcommittee

To Whom It May Concern:

I'm writing you to express concern over cannabis waste regulations. Cannabis waste comes in innumerable forms. I've found that the layman generally associates cannabis waste with leaves, stalks, stems, and other plant and soil byproducts. However, it's important to note that cannabis waste also includes post-extracted cannabis plants and flowers, failed lab tested materials, ancillary manufactured waste (for example, i.e., wax paper, gloves, beakers, etc.), retail display items, and returned/damaged retail items. These streams of waste come from all industry stakeholders: cultivators, manufacturers, retailers, distributors and testing labs. Handling the volume of waste produced by these stakeholders creates an ancillary industry that must be regulated.

The regulations need to be updated to reflect who is qualified to properly manage cannabis waste. The vast amounts of cannabis waste produced by the industry pose a serious risk to public health, specifically children and the disenfranchised, if not handled by properly licensed cannabis waste haulers as opposed to general waste management service providers. Third party cannabis waste management companies must obtain the proper licenses to transport and render cannabis waste. Frequently, cannabis byproduct and waste are indistinguishable from safe-to-consume materials and/or products. To mitigate these risks, limiting the exposure of the public to cannabis waste vis-a-vis safe and sustainable disposal of cannabis waste that has been tracked and traced and handled by licensed cannabis waste haulers is imperative. It will ensure that all ecosystems—the environment, the public and industry stakeholders can successfully co-exist.

Thank you.

## #27

### COMPLETE

Collector: Web Link 1 (Web Link)

Started: Tuesday, February 06, 2018 5:23:16 PM Last Modified: Tuesday, February 06, 2018 5:25:32 PM

**Time Spent:** 00:02:16 **IP Address:** 99.203.10.216

Page 1

Q1 First Name (Optional)

Nicole shepherd

Q2 Last Name (Optional)

Shepherd

Q3 Organization (Optional)

Crop Supply

Q4 Title (Optional)

Director of sales

**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Enforcement Subcommittee** 

### **Q6** Feedback for Subcommittee

Please make changes to the black market that is soaring. Look at electricity bills. Investigate all legal license holders too. It's a ugly market here in LA

## #28

### COMPLETE

Collector: Web Link 1 (Web Link)

Started:Tuesday, February 06, 2018 12:12:40 PMLast Modified:Tuesday, February 06, 2018 7:57:28 PM

**Time Spent:** 07:44:47 **IP Address:** 184.23.243.202

Page 1

**Q1** First Name (Optional)

Charles

Q2 Last Name (Optional)

Rutherford

Q3 Organization (Optional)

Boveda, Inc.

Q4 Title (Optional)

**Business Development Director** 

**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Enforcement Subcommittee** 

### Q6 Feedback for Subcommittee

As a representative of Boveda, Inc., a manufacturer of humidity control technology designed for cannabis flower, I have concern with the emergency regulations released by the Bureau of Cannabis Control (BCC) on 12/7/2017, specifically regarding the lack of a definition for "dry-weight ounce" and the absence of a minimum acceptable moisture content (MC) and water activity level (Aw) to define a range of what is acceptable to enter the commercial market for taxation and quality control purposes.

We see defining "dry-weight ounce" as a critical point because the dryness of cannabis flower and leaves affects the weight of the product. By not defining a range of acceptable MC and Aw when cannabis enters the market for cultivation, taxation and sale, and then using those ranges to define a "dry-weight ounce," an opportunity is created for bad actors to pay less cultivation tax, as well as divert cannabis to the black market. It also removes an aspect of quality control as the flower enters the commercial market and moves through the supply chain to reach the consumer.

In the proposed emergency regulations §5717, the BCC has set a maximum acceptable limit for MC at 13%, and AW at 0.65 for cannabis, which ensures the safety of the cannabis from microbial growth. But they set no minimum limit, thus not defining "dry-weight ounce".

The ability to manipulate weight through drying can be used by less scrupulous licensees to reduce tax payments and create the opportunity for diversion by over-drying and rehydrating harvested cannabis at different stages in the supply chain. As cannabis dries further, this reduction in weight also has implications within the track and trace system. If the BCC does not define acceptable ranges for MC and Aw that must be maintained throughout the supply chain, there is a potential for cannabis to dry further during transport and storage. Over time, this could produce a discrepancy between the weight recorded in track and trace upon receipt of the cannabis and the weight upon the point of entering the manufacturing process or transfer to retail.

It is for all these reasons that we believe the Cannabis Advisory Committee should recommend the BCC make these clarifications in future regulations. Based on research and our field experience with Aw levels, it is our recommendation that the following changes be made to the BCC's regulatory language:

§5717 (b) should deem a cannabis sample as passing water activity testing if Aw is at or above 0.55 and at or below 0.65 §5717 (c) should deem a cannabis sample as passing moisture content testing if MC is at or above 5% and at or below 13% Create a definition for "dry-weight ounce" using the ranges for Aw and MC recommended above

My colleagues and I are available to discuss the importance of these recommendations, which, if implemented, will help reduce the ability to divert legal cannabis to the black market. Please contact me at (952) 745-2905 or charles.rutherford@bovedainc.com if you have any questions regarding my comments.

# #29

Collector: Web Link 1 (Web Link)

Started: Tuesday, February 06, 2018 8:20:42 PM Last Modified: Tuesday, February 06, 2018 8:21:43 PM

**Time Spent:** 00:01:01 **IP Address:** 162.201.66.29

Page 1

Q1 First Name (Optional) Respondent skipped this question

Q2 Last Name (Optional) Respondent skipped this question

Q3 Organization (Optional)

Mendocino Generations

Q4 Title (Optional) Respondent skipped this question

**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Enforcement Subcommittee** 

#### Q6 Feedback for Subcommittee

Dear Subcommittee Members,

We write to you today, as a group of small farms located throughout Mendocino County, to express our concerns with the current cannabis emergency regulations and are providing input on changes we would like to see made in the new regulations. We are grateful for the opportunity as stakeholders and interested parties to engage in this process. We hope that our suggestions will be considered when drafting the new regulations so that the cannabis-licensing program can operate with efficiency and success.

The largest license type allowed in Mendocino County is 10,000 sq ft of plant canopy. This equates to less than a quarter acre and considered a "hobby garden" by agricultural standards.

State regulations must take the vast disparity in permitted size cultivations throughout the state into consideration as permanent regulations are formulated. Committees must understand the historical significance and economic dependence of counties in the north coast region on cannabis cultivation. Small cannabis farmers need state protection to continue into the regulated and legal era to allow for a viable transition and avoid epidemic bankruptcies, defaults, plummeting property tax revenues and destruction of a unique cultural fabric that can be the regions opportunity rather than its demise.

Various compliance issues imposed specifically on the cannabis industry, and no other agricultural industry in California, by CDFA, CWQCB, Cal Fire, CDFW, and a slew of local jurisdictions are simply not viable for small farmers if scale, rural access, cooperative

efficiencies and considerations for sustainable methods are not protected by the BCC.

Even though some small farmers may diversify into processing and or low impact manufacturing as regulations allow, our primary concern at this writing is for the small farmer, terrified that their homes, livelihood and decades of investments in the development of methods and genetics will arbitrarily be taken from them by the BCC if the ACA does not act now on their behalf.

Small cannabis cultivators must be afforded the same considerations and protections as other small agricultural endeavors like small vineyards, artisan breweries and related boutique style retailing of their products. As stated in SB94 and its incorporation into Business and Professional Code 26013(c), upon which all cultivators in the state relied under MAUCRSA, "mandate only commercially feasible procedures, technology or other requirements, and shall not unreasonably restrain or inhibit the development of alternative procedures or technology to achieve the same substantive requirements, nor shall such regulations make compliance so onerous that the operation under a cannabis license is not worthy of being carried out in practice by a reasonably prudent business person".

#### REGARDING ENFORCEMENT:

The primary concern of all cannabis cultivators is that their crop, often only one per year in Mendocino County, not be subjected to illegal eradication or the farmer be subjected to prosecution due so some "glitch" of communication between state agencies as well as state and local departments and agencies, over- zealous enforcement personnel, and/or conflicts in jurisdictional imperatives. We have already experienced an arrest, and business shut down by the CHP, of a distributor locally licensed by Mendocino regulations. Fairness demands language that mutually respects jurisdictions in the development of regulatory imperatives.

Currently, there are conflicting regulations and interpretations of codes and statues between CDFW and CWQCB pertaining to water rights, a huge and onerous obstacle for small farmers. CDFW has an extremely long review process which is preventing local and state permits from being reviewed in a timely manner, thus threatening small farmers ability to be compliant at any level.

Mendocino Generations requests that ALL STATE AGENCY TEMPORARY LICENSING BE EXTENDED UNTIL JUNE 30, 2018 TO ALLOW FOR INTER AGENCY AND STATE AND LOCAL JURISDICTIONS TO ESTABLISH ADEQUATE COMMUNICATION PROTOCOLS, THUS AVOIDING UNNECESSARY HARDSHIPS FOR CANNABIS BUSINESSES

Thank you for your consideration and support,

Audrey's Farm

Big Dirty Farms

**Briza Botanicals** 

**Brother Bee Farms** 

Coastal Ridge Botanicals

**Emerald Naga Farms** 

**Empire Gardens** 

Flatbed Ridge Farms

Fire Flower Farm

Full Sun Farms

Giving Tree Farms

**Granny Jacks** 

Gypsy Wagon Farms

Herbanology Farms

Higher On The Hog Farms

**Hummingbird Farms** 

Laughing Farms

Le Foret

Magnolia & Fig Cultivars

Mendocino Grasslands

Mendocino Organic Medicine

. .

Moongazer Farms

Oak Knoll Farms

One Feather Ranch

Potter Valley Farms

Reach High Farm

River Txai Farms

Sensi Farms

Sun N Moon Ranch

Sunbright Gardens

Sweet Sisters Family Farm

**UV** Organics

## #30

Collector: Web Link 1 (Web Link)

Started: Tuesday, February 06, 2018 9:03:50 PM Last Modified: Tuesday, February 06, 2018 9:11:32 PM

**Time Spent:** 00:07:42 **IP Address:** 23.113.88.220

Page 1

Q1 First Name (Optional)

Karen

Q2 Last Name (Optional)

**Byars** 

Q3 Organization (Optional)

Mendocino Cannabis Resource

Q4 Title (Optional)

owner

**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Enforcement Subcommittee** 

### **Q6** Feedback for Subcommittee

Please train all CA law enforcement agencies on the new regulations & the protocol of what to do if they are interacting with someone with a CA cannabis permit. There is a number they can call, according to a resent conversation I had with Laurie Ajax that has been setup by the BCC, to verify the permit. WE need to make it a priority to keep those with permits safe.

## #31

Collector: Web Link 1 (Web Link)

Started: Tuesday, February 06, 2018 9:37:05 PM Last Modified: Tuesday, February 06, 2018 9:38:03 PM

**Time Spent:** 00:00:58 **IP Address:** 184.63.249.150

Page 1

Q1 First Name (Optional)

Charles

Q2 Last Name (Optional)

Sargenti

Q3 Organization (Optional)

Respondent skipped this question

Q4 Title (Optional)

Respondent skipped this question

**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Enforcement Subcommittee** 

### Q6 Feedback for Subcommittee

1.Remove Track and Trace requirements of weighing wet weight at harvest. This requirement does not make sense since the cannabis will change greatly in weight once it is fully dried. Weather (hot and dry vs rainy) will also greatly affect wet weight so there will be no benefit to a wet weight as it's completely arbitrary. Each plant and strain will vary in terms of how much moisture is lost in the curing process. Therefore for cultivators selling dry product, require a dry weight amount to be entered and not wet weight of the entire plant.

## #32

Collector: Web Link 1 (Web Link)

Started: Tuesday, February 06, 2018 10:51:37 PM Last Modified: Tuesday, February 06, 2018 11:06:12 PM

**Time Spent:** 00:14:35

**IP Address:** 173.228.119.237

Page 1

Q1 First Name (Optional) Respondent skipped this question

Q2 Last Name (Optional)

Respondent skipped this question

Q3 Organization (Optional)

Respondent skipped this question

Q4 Title (Optional)

Respondent skipped this question

**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Enforcement Subcommittee** 

### Q6 Feedback for Subcommittee

Until the state has held workshops on compliance and other topics to solicit questions and feedback, enforcement should be deprioritized. And data collection, when enforcement starts up should include tracking of racial data. Such data can be used to determine implicit bias in enforcement.

## #33

Collector: Web Link 1 (Web Link)

**Started:** Wednesday, February 07, 2018 11:01:29 AM Last Modified: Wednesday, February 07, 2018 11:04:14 AM

**Time Spent:** 00:02:45 **IP Address:** 23.119.139.180

Page 1

Q1 First Name (Optional) Respondent skipped this question

Q2 Last Name (Optional)

Respondent skipped this question

Q3 Organization (Optional)

Respondent skipped this question

Q4 Title (Optional)

Respondent skipped this question

**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Enforcement Subcommittee** 

### **Q6** Feedback for Subcommittee

look at the underground cannabis market and figure out how to get most of it legal - helps a lot

## #34

Collector: Web Link 1 (Web Link)

Started: Wednesday, February 07, 2018 11:04:18 AM Last Modified: Wednesday, February 07, 2018 11:04:29 AM

**Time Spent:** 00:00:11 **IP Address:** 23.119.139.180

Page 1

Q1 First Name (Optional) Respondent skipped this question

Q2 Last Name (Optional)

Respondent skipped this question

Q3 Organization (Optional)

Respondent skipped this question

Q4 Title (Optional)

Respondent skipped this question

**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Enforcement Subcommittee** 

### **Q6** Feedback for Subcommittee

look at the underground cannabis market and figure out how to get most of it legal - helps a lot